

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

**BLAKE BEELER, et al.,**

**Plaintiffs,**

**v.**

**JEFF LONG,**

**Defendant.**

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**No. 3:21-cv-152**

**Judge Katherine A. Crytzer**

**Magistrate Judge Debra C. Poplin**

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**JOINT MOTION TO EXTEND STAY OF CASE PENDING SUBMISSION  
OF AGREED ORDER**

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Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and this Court’s Order (D.E. 38), the Parties jointly and respectfully request that this Court extend the January 13, 2023 deadline for filing an agreed stipulation or agreed order of dismissal by ten days, up to and including January 23, 2023. (D.E. 38.)

In support of this request, as good cause, the Parties state as follows. On November 14, 2022, the parties jointly moved to stay this case, stating that they “have agreed on a path to resolution of the case that involves the submission of an agreed order of judgment that would resolve the case in its entirety” but that they “require[d] additional time to negotiate and draft the terms for the Court’s approval.” (D.E. 37, PageID 55-56.)

The Court granted the joint motion on November 18, 2022, and ordered that by January 13, 2023, the parties file “an agreed stipulation under Federal Rule of Civil Procedure 41(a)(1)(A)(ii) or submit an agreed order of dismissal under E.D. Tenn. ECF Rule 4.8 . . . .” (D.E. 38.)

Since the Court’s order, the parties have conferred by videoconference on multiple occasions to discuss agreeable material terms and to negotiate a timeline for compliance with those

terms. These good-faith efforts have required multiple communications between counsel for the parties and their clients in order to ascertain a resolution that would be acceptable to the parties, as well as this Court.

Defendant has prepared and reduced to writing a proposed agreed order that stipulates to relief from this Court that fully resolves the case, which includes resolution of any post-judgment motions. Defendant recently transmitted that proposal to Plaintiffs and has received timely comments and revisions. However, the parties require additional time to confer with their clients to determine the acceptability of these revisions and any counter-proposals to them. The parties will endeavor to accomplish this process in the coming ten days.

Therefore, the parties jointly request an extension of ten days, up to and including January 23, 2023, to submit their proposed agreed order to the Court. Good cause exists to grant this extension because, as explained above, an extension would serve the parties' efforts resolve this case in its entirety, which would obviate the need for further litigation or expenditure of the Court's or the Parties' resources.

Respectfully Submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed electronically and served through the electronic filing system on this the 13th day of January 2023, upon the following:

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